

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

SHAHID TANVIR

Index 05 CV 5843(BSJ) (RLE)

Plaintiff,

--against--

NEW YORK CITY HEALTH AND HOSPITALS
CORPORATION

PLAINTIFF'S 56.1
STATEMENT OF
FACTS

Defendant

X

Plaintiff's Statement of Facts

Plaintiff is in agreement with defendant's Preliminary Statement of Facts under Local Rule 56.1 of the Civil Rules of the United States District Court for the Southern District of New York except as to the following"

1. Admitted.
2. Admitted.
3. Admitted.
4. Plaintiff denies paragraph 4 as it pertains to plaintiff's primary job functions. Plaintiff's primary job function was to analyze blood specimens through automatic analyzers. Additionally defendant fails to state that I was the weekend supervisor for a period of ten years while at Morrisania Diagnostic Treatment Center beginning in or around 1989 until 1999.
5. Plaintiff does not deny paragraph 5 but it should be added that this promotion to Level B came about only after plaintiff filed a grievance